

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

ENCOMPASS INSURANCE COMPANY OF
MASSACHUSETTS,

Plaintiff/Counterclaim Defendant,

v.

JOSEPH D. GIAMPA, FREDERICK T.
GIAMPA, ADVANCED SPINE CENTERS,
INC. d/b/a FIRST SPINE REHAB, FUTURE
MANAGEMENT CORPORATION, FUTURE
MANAGEMENT BUSINESS TRUST,
EDWARD KENNEDY, BRIAN J. CULLINEY,
D.C., and JENNIFER MCCONNELL, D.C.,

Defendants/Counterclaim Plaintiffs,

CIVIL ACTION NO. 05-11693 RCL

**STIPULATION EXTENDING TIME TO ANSWER,
PLEAD OR OTHERWISE RESPOND TO COUNTERCLAIMS**

Plaintiff/Counterclaim Defendant Encompass Insurance Company of Massachusetts (“Encompass”), and Defendants/Counterclaim Plaintiffs Joseph D. Giampa, Frederick T. Giampa, Advanced Spine Centers, Inc. d/b/a First Spine Rehab, Future Management Corporation, Future Management Business Trust, Edward Kennedy, Brian J. Culliney, D.C. and Jennifer McConnell, D.C., by and through their respective counsel, hereby stipulate and agree that the time for Encompass to answer, plead or otherwise respond to all counterclaims in the above-captioned matter shall be extended until February 19, 2007 . No prior extensions have been sought as to these claims.

Respectfully submitted, this 5th day of January, 2007.

/s/ Richard D. King, Jr.

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AS TO COUNTERCLAIMS

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JENNIFER MCCONNELL

CERTIFICATE OF SERVICE

I, Jay B Kesten, hereby certify that on this 5th day of January, 2007, this **Stipulation Extending Time To Answer, Plead, Or Otherwise Respond To Counterclaims** was filed through the CM/ECF and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing. Paper copies will be sent to those indicated as non registered within twenty-four (24) hours of this filing.

/s/ Jay B Kesten

Jay B Kesten